

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

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In the Matter of:	)	UM 1773
	)	
<b>PORTLAND GENERAL ELECTRIC COMPANY,</b>	)	<b>PETITION TO INTERVENE OF CAPITAL POWER US HOLDINGS LLC</b>
	)	
Petition for Partial Waiver of Competitive Bidding Guidelines and Approval of Request for Proposals (RFP) Schedule	)	

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Capital Power US Holdings LLC (“Capital Power”) hereby petitions the Public Utility Commission of Oregon (“Commission”), pursuant to ORS § 756.525 and OAR 860-001-0300, for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and addresses of the Intervenor is as follows:

Capital Power US Holdings LLC  
C/O/ **Dennis Desmarais**  
Director, Business Development  
16055 NW Edward Ct  
Beaverton OR 97006  
[DDesmarais@capitalpower.com](mailto:DDesmarais@capitalpower.com)  
P: 971.713.3938

Capital Power US Holdings LLC  
C/O **Chris Bursaw**  
Director, Regulatory US  
155 Federal Street  
Boston, MA 02110  
[CBursaw@Capitalpower.com](mailto:CBursaw@Capitalpower.com)  
P. 617.330.1341

2. Intervenor, Capital Power Corporation, will be represented herein by:

**Carl Fink** (OSB No. 980262)  
Blue Planet Energy Law, LLC  
Suite 200  
628 SW Chestnut Street  
Portland, Oregon 97219  
Telephone: 971.266.8940  
[CMFINK@Blueplanetlaw.com](mailto:CMFINK@Blueplanetlaw.com)

3. Capital Power requests that the names of Dennis Desmarais, Chris Bursaw and Carl Fink be placed on the official service list for this docket.
4. Capital Power is a growth-oriented North American power producer headquartered in Edmonton, Alberta. The company develops, acquires, operates and optimizes power generation from a variety of energy sources. Capital Power owns more than 3,200 megawatts of power generation capacity at 18 facilities across North America, and is actively engaged in additional development, including development of wind and solar generation projects in Oregon.
5. On May 4, 2016, PGE filed a petition for a partial waiver of two of the Commission's competitive bidding guidelines, along with a request for approval of PGE's proposed request for proposals ("RFP") schedule.
6. By Order of June 8, 2016, the Commission issued an order in this docket (Commission Order 16-221) in which it, *inter alia*, adopted a public comment period until June 28, 2016 to help inform PGE of potential changes to the final draft RFP.
7. ORS § 756.525(2) allows any person to seek permission to appear and participate prior to the final taking of evidence. This Commission is still taking comments from stakeholders in this docket.
8. Capital Power has a substantial interest in this proceeding that is not adequately represented by any other party. Capital Power's interest in this proceeding may be affected by any Commission determination made in connection with these proceedings. The outcome of this proceeding may directly impact Capital Power's participation in the RFP. It is in the public interest to allow Capital Power to intervene in this proceeding.
9. Capital Power also respectfully requests expedited consideration of this Petition to Intervene such that Capital Power has full party status at the earliest possible date.
10. Capital Power asks that the Commission, PGE and the other interested persons be further advised that Capital Power is interested in participating in the stakeholder discussions suggested in Commission Order 16-221, regarding RFP issues and concerns.

11. Capital Power intends to respond to the RFP with one or more proposals. Consistent with the Petition to Intervene filed in this Docket by Obsidian Renewables, LLC, as granted by the Administrated Law Judge on June 10, 2016, in order to avoid any concern about its status as a bidder and its participation in the RFP process, Capital Power does not intend to sign the protective order at this time nor seek access to any confidential information. Capital Power is willing to leave the room and to stop participating in discussions involving confidential information should such matters come up.

12. Without the opportunity to intervene herein, Capital Power would be without any means of participation in this proceeding which may have a material impact on its business activities in the State of Oregon.

13. Granting Capital Power's petition to intervene will not unduly broaden the issues, and nor will it unduly prejudice any party to this case.

14 For all reason stated herein, in compliance with the Commission's rules of procedure, Capital Power requests to participate in this proceeding as an Intervenor with all rights incumbent to that status. Granting Capital Power's request will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Respectfully submitted this 15th day of June, 2016.

*s/ Carl Fink*

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